

Todd I. Shugart  
Assistant United States Attorney  
Wyoming Bar Number 6-3551  
P.O. Box 22211  
Casper, WY 82602  
(307) 261-5434  
[todd.shugart@usdoj.gov](mailto:todd.shugart@usdoj.gov)

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2014 JUL 25 PM 3 27  
STEPHAN HARRIS, CLERK  
CHEYENNE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 14-CR-27-F

JOSEPH RUBEN HILL, MITCHELL  
PAUL MODELESKI, aka Paul Andrew  
Mitchell, LUCILLE KATHLEEN HILL,  
LAWRENCE KEVIN PAILLE,  
STEPHANIE LENORE MACIEL, and  
GLORIA JEAN REEDER,

Defendants.

MOTION TO SEAL SUPERSEDING INDICTMENT

COMES NOW the United States of America, by and through its attorney, Todd Shugart, Assistant United States Attorney for the District of Wyoming, and pursuant to Rule 6(e)(4), Fed. R. Crim. P., hereby moves the court for an order sealing the superseding indictment in the above-captioned matter until the Defendants Lucille Kathleen Hill, Lawrence Kevin Paille, Stephanie Lenore Maciel, and Gloria Jean Reader, have been arrested. Joseph Ruben Hill and Mitchell Paul Modeleski, aka Paul Andrew Mitchell, have previously been served. This case involves individuals who are alleged to have taken great steps to obstruct the government and have repeatedly professed that the United States lacks authority and jurisdiction over their tax matters.

Therefore, the government has good reason to believe that these individuals will flee in an effort obstruct process in this particular case if the superseding indictment is not sealed. The superseding indictment was returned on July 24, 2014.

DATED this 25<sup>th</sup> day of July, 2014.

CHRISTOPHER A. CROFTS  
United States Attorney

By:

  
TODD I. SHUGART  
Assistant United States Attorney